MEMORANDUM

SUBJECT: Comments on the PRP's Responses to EPA Comments on the BERA Problem Formulation and Work Plan/SAP

FROM: Susan Roddy

TO: Gary Miller

DATE: May 24, 2010

1. Responses to Comments # 3,10,30,33,34,43,48,51,54,62,and 68 where the response is that no soil toxicity testing is proposed for soil invertebrates. Soil toxicity testing for soil invertebrates shall be proposed. Regarding proposal of soil toxicity testing, in particular, see EPA's comment #30 where it is stated that regardless of a pending soil removal on the soils North of Marlin Av, soil invertebrate toxicity testing shall be proposed, and then, if the removal action does occur, modification to the Work Plan/SAP can be made.

2. Response to Comments #7, 31, and 55; Specific details were not found in the text (Section 3) nor in Table 1 of the Work Plan/SAP (as per EPA comments) regarding type 1 error statistical statements/null hypotheses statements. This information shall be provided.

3. Response to Comment #11: The words "consideration of background metals concentrations" was not removed from the executive summary page v. Metals did not remain in the Problem Formulation. This shall be addressed including sampling for zinc.

4. Response to Comment #15: Regarding the decision on metals related to background, EPA's comment was not (and shall be) addressed especially regarding zinc (see page 8). Thus, for the toxicity testing, the additional sample locations EWSED 08 and EWSED 09 from Table 2 of the Work Plan/SAP shall include sampling for zinc.

5. Response to Comments #17, and 45: More detailed explanation shall be provided in the text than found on page 16 regarding the concentration ranges to be sampled for each contaminant. It was noted that Table 2 or the Work Plan/SAP did have notations that samples would be collected in areas where there were no hazard quotient exceedances. Additional sample locations shall be proposed for the toxicity testing to capture the zinc gradient. These shall include: SB202 (soil location where zinc was measured at 5640 mg/kg), EWSED 08 and EWSED09 (the additional wetland sediment sample locations added to Table 2 of the Work Plan/SAP and mentioned above), NF4SE13 (wetland sediment location where zinc was measured at 903 mg/kg), SPSE03 (pond sediment location where zinc was

measured at 999 mg/kg), and 4WSED3 (wetland sediment where zinc was measured at 290J mg/kg). The text shall also include the sample ID and range of concentrations each for the locations where sampling LPAHs, HPAHs, and TPAHs, metals (zinc), and pesticides (4,4-DDT and endrin aldehyde, and endrin ketone) will be conducted in conjunction with the toxicity testing.

6. Response to Comment #32: No specific discussion was found regarding use of toxicity tests for determining site-specific NOAELs or LOAELs as per EPA's comment. It appeared on page 17 that only a comparison of site to background toxicity tests would be conducted. Plus, there was no discussion found in Section 3 regarding a methodology for determining PRGs. Both discussions of site-specific NOAEL and LOAEL estimations from the site-specific toxicity tests, and the method of PRG determination shall be provided.

7. Response to Comment #47: Neither the proposed depth nor rationale was provided for the Neanthes polychaete toxicity test in consideration of its burrowing behavior. This information shall be provided. And, Figure 7 (mentioned in the Response to Comments) shall indicate the sample depths specific for each toxicity test (and related sampling) by sample location.

8. Response to Comment #53: Section 3.5 (page 16, third paragraph) contains language regarding sample locations focusing where HQs >3. Instead, the language for sample locations shall be focused on where HQs>1, and the reference to HQ>3 shall be deleted.

9. Response to Comment # 61: Ninety instead of 60 days were proposed. Sixty days is the requirement.

10. Response to Comment #65: Completeness was required to be 100%, yet 95% was the response. Data completeness shall be 100% for surface water.